

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JIM TROTTER,	:	
Plaintiff,	:	
	:	23-cv-8055 (JSR)
-v-	:	
	:	
THE NATIONAL FOOTBALL LEAGUE; NFL	:	<u>ORDER</u>
ENTERPRISES LLC; AND NFL NETWORK	:	
SERVICES, INC.,	:	
	:	
Defendants.	x	

JED S. RAKOFF, U.S.D.J.

At the Court's direction, each party has submitted a letter brief (which will be docketed) regarding 13 discovery issues. The disputes are hereby resolved as follows:

Dispute No. 1: Timing of Defendants' Production. Any remaining disputes over search terms need to be submitted to the Court by joint telephone call this Wednesday at 5pm. After the Court decides the search terms, the search of responsive documents must be completed by August 26, 2024. Production of all non-privileged documents so identified must be made by August 29, 2024.

Dispute No. 2: Privilege Log. Defendants' privilege log must be completed by August 30, 2024, and submitted to the Court and plaintiff's counsel. The Court will then conduct an *ex parte* review of a random sample of such documents determined by the Court.

Dispute No. 3: Documents Related to the "Overall Media Talent Restructuring." Plaintiff's request is granted.

Dispute No. 4: Employees Terminated/Hired During Restructuring. Plaintiff's request is granted.

Dispute No. 5: Mr. Trotter's Complaints About Discrimination by Two NFL Team Owners. Plaintiff's request is granted.

Dispute No. 6: Other Complaints/Reports of Race Discrimination. Plaintiff's request is denied except as already consented to by defendants.

Dispute No. 7: DEI Problems or Retaliation. Plaintiff's request granted.

Dispute No. 8: Documents Related to Witnesses. Plaintiff's request is denied as premature.

Disputes No. 9 through No. 13 Related to Interrogatories. All the disputed interrogatories are hereby stricken. However, plaintiff may propound, by no later than August 21, 2024, a single interrogatory seeking the "names of witnesses with knowledge of information relevant to the subject matter of the action." Local Civil Rule 33.3(a). Such interrogatory must be answered by September 20, 2024.

SO ORDERED.

Dated: New York, NY
August 19, 2024


JED S. RAKOFF, U.S.D.J.